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August 13, 2025

VIA CM/ECF

Hon. Katharine H. Parker
United States District Court
Southern District of New York
500 Pearl Street
Courtroom 17D
New York, New York 10007

WWW.ALLYNFORTUNA.COM

Re: *Sound Around, Inc. v. Friedman et al.*
Case No. 1:24-cv-01986

Dear Judge Parker:

This firm represents Defendants Moises Friedman, Shulim Eliezer Ilowitz, ML Imports, Inc., CYRF, Inc., LRI Group, LLC, MDF Marketing Inc., and World Group Import, LLC (“Friedman Defendants”) in the above-referenced matter. This letter, which is submitted on behalf of Plaintiff Sound Around, Inc. (“Plaintiff”) and the Friedman Defendants, is to request a 45-day extension of the deadlines to complete expert discovery as set forth in Your Honor’s Scheduling and Post-Conference Order dated November 7, 2024 (ECF Doc. No. 109).

Currently, the deadline for the parties to complete expert discovery is October 31, 2025, with affirmative expert reports due to be served on August 29, 2025 and rebuttal expert reports to be served by September 30, 2025. Due to outstanding discovery issues, of which this Court is aware and is scheduled to address at the September 10, 2025, hearing, the parties require additional time to obtain relevant discovery and provide such information to potential expert witnesses. A 45-day extension of the expert discovery deadlines will allow the parties to prepare potential expert witnesses and provide them with the necessary information to render accurate opinions in this matter. The extension of expert discovery will not affect the current end date for the completion of fact discovery, which is October 31, 2025, or the schedule for the submission of summary judgment motions set by Judge Denise L. Cote in the Pretrial Scheduling Order dated June 10, 2025 (ECF Doc. No. 195). Therefore, the parties jointly propose the following deadlines:

Service of affirmative expert reports:	October 13, 2025
Service of rebuttal expert reports:	November 14, 2025
Completion of expert discovery:	December 15, 2025

The parties have made no prior requests for the extension of the deadlines to complete expert discovery. We thank the Court for your time and consideration.

HOLLAND & KNIGHT LLP
Counsel for Plaintiff

ALLYN & FORTUNA LLP
Counsel for the Friedman Defendants

By: /s/Jesus Cuza
Jesus Cuza

By: /s/ Nicholas Fortuna
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